

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

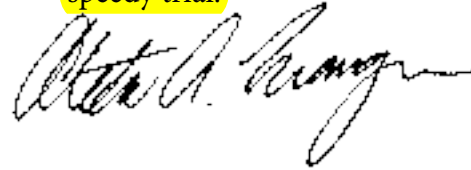
Motion GRANTED
conditioned upon the
timely filing of a waiver of
speedy trial.

UNITED STATES OF AMERICA

v.

JAMIE LYNNE HALL

**No. 3:14-00040
JUDGE TRAUGER**



**MOTION TO CONTINUE DECEMBER 9 TRIAL
AND EXTEND TIME FOR FILING PRETRIAL MOTIONS**

Through counsel, defendant Jamie Lynne Hall moves to continue her December 9, 2014 trial and to extend the time for filing pretrial motions. Ms. Hall is released on bond pending trial and resides and works in Kentucky. Ms. Hall faces a mandatory minimum sentence of ten years if convicted as charged in this case.

In support of this motion, Ms. Hall would show the following: The government has produced discovery. Defense counsel has conferred several times both with the prosecutor and Ms. Hall regarding the facts and circumstances of this case. Defense counsel's investigation and the parties' negotiations are ongoing, but not yet completed. The defendant seeks to continue this matter in order to prepare effectively for trial and to ensure that all investigation and negotiations are explored before this matter proceeds to trial.

Ms. Hall concurs in the request for a continuance, and will be signing and filing a speedy trial waiver.

Assistant U.S. Attorney Louis Crisostomo advised that he has no opposition to a continuance.

For the reasons stated above, Ms. Hall moves to continue her December 9, 2014 trial date and to extend the time for filing pretrial motions until 28 days before trial. Due to scheduling issues, counsel asks that this matter be re-set after March 1, 2015.